




Response to Reclamation Permit Surety Release Request Consideration

DATE: October 8, 2021  
TO: Peter S. Hays, Environmental Protection Specialist  
FROM: Sarah Brucker, P.E.   
RE: Loloff Pit, Permit No. M-1985-112, SL-1  
Applicant/Operator: Loloff Construction, Inc.  
Phone Number: (970) 566-5090  
NW¼ Section 4, Twp 5 North, Rng 65 West, 6th P.M., Weld County

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**COMMENTS:** The applicant has submitted a request for full/final surety (bond) release for the Loloff Pit, which consists of 55.17 permitted acres located approximately 1.5 miles northeast of Greeley. Gravel mining at the site concluded in August 2019, and dewatering at the site ceased after July 2019. The slurry wall liner for the Loloff Pit was approved by the State Engineer's Office as meeting the design standard for liners on April 26, 2019, and the Loloff Pit is now classified as a lined reservoir in accordance with the August 1999 State Engineer Guidelines for Lining Criteria for Gravel Pits (Loloff Reservoir, WDID 0303483).

There has been no consumptive use of groundwater at the site since the pit has been lined; however lagged depletions from past mining and dewatering operations at the site continue to impact the river. Lagged depletions are currently replaced under the Loloff Substitute Water Supply Plan (Plan ID 3270) approved on April 29, 2021, which covers depletions through March 31, 2021. Depletions associated with past operations at the Loloff Pit will continue to impact the river beyond the end of this plan period and must continue to be replaced under a substitute water supply plan approved by the state engineer until there is no longer an effect on stream flow. This office has repeatedly recommended that the applicant revise the modeling of lagged depletions by switching from the stream depletion factor (SDF) method to an alluvial aquifer method for future renewals of the Loloff Substitute Water Supply Plan in order to reduce the number of years that the remaining lagged depletions will extend out. The total amount of depletions to be replaced under the alluvial aquifer method will need to equal the total amount of remaining depletions calculated using the stream depletion factor (SDF) method. The Division of Water Resources has also informed the applicant that this office will not comment favorably on any request for surety release until all lagged depletions associated with the site have been fully replaced.

The Division of Reclamation, Mining and Safety and/or the applicant may contact the State Engineer's Office with any questions.

